12. STATUTORY DETERMINATION

The selected remedy for each site, including the "No Action" and "No Further Action" sites, meets the statutory requirements of CERCLA Section 121, the regulations contained in the NCP, and the requirements of the FFA/CO for the INEEL. Regulatory compliance for each selected remedy for each group is summarized in the following sections. All remedies meet the threshold criteria established in the NCP (i.e., protection of human health and the environment and compliance with ARARs). CERCLA also requires that the remedy use permanent solutions and alternative treatment technologies to the maximum extent practicable, and that the implemented action must be cost-effective. Finally, the statute includes a preference for remedies that employ treatment that permanently and significantly reduces the volume, toxicity, or mobility of hazardous wastes as their principal element. For many of the sites contaminated with radionuclides, effective treatment technologies are currently unavailable, and therefore, the preference for permanent solutions cannot be met except through natural radioactive decay processes over time.

12.1 Protection of Human Health and the Environment

As described in Section 11, the selected remedy for each site satisfies the criterion of overall protection of human health and the environment. The selected remedies for each site and the means by which each type of alternative meets this criterion are further described in Section 12.1.1 through 12.1.9.

12.1.1 "No Action" Sites

The Agencies have determined that "No Action" be taken under CERCLA at 34 sites. Ten sites were classified as "No Action" sites with the signing of the FFA/CO. An additional 24 sites were determined to be "No Action" sites through Track 1 or 2 investigations or RI/BRA analysis. "No Action" sites are those sites that have no contaminant source or have a contaminant source with an acceptable risk level (less than 1×10^{-4}) as determined in the BRA (DOE-ID 1997b). Table 4-1 lists the "No Action" sites in OU 3-13.

As a result of the "No Action" decision for these sites, the Agencies have determined that these sites pose no short- or long-term risks to human health or the environment. Therefore, the "No Action" decision provides for overall protection of human health and the environment.

12.1.2 "No Further Action" Sites

The Agencies have determined that "No Further Action" be taken under CERCLA at six sites. Table 4-1 lists the "No Further Action" sites. A "No Further Action" site is a site that has a contaminant source or a potential contaminant source present that does not have an exposure route resulting in risks greater than 1×10^{-4} for the risk scenario evaluated under the assumed site controls. These sites were determined to be "No Further Action" sites through Track 1 or 2 investigations and RI/BRA analysis. The "No Further Action" sites are sites where remedial action is being taken. However, the only remedial action is Institutional Controls.

Short- and long-term protection will be provided for the "No Further Action" sites using institutional controls. The institutional controls will be maintained at these sites until the Agencies determine that access or land use restrictions are no longer needed to prevent potential exposures or the perceived risk is considered acceptable. The institutional controls during the period of DOE operations will include property lease requirements, including control of land use consistent with this ROD. Institutional controls after DOE operations cease will include property transfer restrictions, including a

finding of suitability to transfer and requirements for control of land use consistent with this ROD. The institutional controls will be tracked using the INEEL Land Use Plan. The "No Further Action" sites will be reviewed during the CERCLA 5-year review process to verify the effectiveness of the "No Further Action" decisions.

The Agencies believe that these controls will provide overall protection of human health and the environment for the "No Further Action" sites. The institutional controls will be maintained at these sites until an unacceptable risk to human health or the environment no longer exists .

12.1.3 Tank Farm Soils Interim Action Selected Remedy: Alternative 3—Institutional Controls with Surface Water Controls

An interim action was selected for the Tank Farm Soils release sites. A final remedial action will be developed under OU 3-14 following additional site characterization, risk analysis, and remedial alternative evaluation. The interim action will be performed to minimize contaminant exposures to the public and to limit further impacts to soil and groundwater until a final remedy is implemented under OU 3-14. A final remedy decision is anticipated prior to 2008. Based on currently available information, the interim action is not inconsistent with the expected final remedy for the Tank Farm Soils. The selected interim action is designed to prevent short-term exposure to contaminants present at the site and to minimize moisture infiltration that may occur and leach and transport contaminants to the perched water or SRPA.

The selected interim action will provide short-term protection of human health and the environment while the final remedy is developed and selected. Short-term protection will be provided by this alternative through existing and additional institutional controls, including radiological engineering controls and health and safety procedures, which will limit current worker and non-worker access or exposure to contaminated soils. Engineering controls will be used to minimize fugitive dust or toxic emissions during construction activities and provide short-term protection during implementation of the interim action. Additional short-term protection will be provided by surface water controls which will facilitate management of an unplanned spill or release and significantly reduce surface water infiltration into the Tank Farm soils. Some measure of long-term protection is provided by the reduction of surface water infiltration into the Tank Farm soils which will limit expected leaching and transport of contaminants to the perched water and minimally reduce available water in the perched zone. These actions will provide overall protection of human health and the environment by minimizing the potential for environmental releases and future groundwater quality impacts to the SRPA.

The Agencies believe that this interim action best satisfies the 5 balancing criteria and will be protective of human health and the environment while the OU 3-14 Tank Farm RI/FS is performed. Further, this action will satisfy RAOs and will not be inconsistent with the expected final Tank Farm remedy and the HLW & FD EIS currently being conducted.

12.1.4 Soils Under Buildings or Structures Selected Remedy: Alternative 2—Existing and Additional Institutional Controls and Containment

The selected alternative for the Soils Under Buildings and Structures is a deferred action that consists of existing and additional institutional controls and soil capping or excavation. The selected remedy will provide short-term protection of human health and the environment through the implementation of existing and additional institutional controls that reduce the potential for current worker, non-worker, or community access or exposure to contaminated soils. Implementing the remedy will not pose unacceptable short-term risks to the community, workers, or the environment. Engineering controls, radiological engineering controls, and health and safety procedures will be used to minimize any

short-term risks to current workers, non-workers, or the community during barrier construction or soil excavation, if necessary. Safe work practices will be used to minimize personnel injury during construction activities.

Long-term protection of human health and the environment will be achieved by containing the contaminated soils beneath the existing buildings, or structures, or capping with an engineered barrier or excavating the contaminated soils should the building or structure be removed and the soils exposed. If the building or structure is removed such that the contaminated soils are exposed, capping or excavation will be implemented to provide long-term protection. The engineered barrier will be designed to limit exposure to contaminated soils and to minimize infiltration of precipitation into the contaminated soils which could potentially leach and transport contaminants to the SRPA for at least 1,000 years. Soils that are excavated will be handled as Group 3 soils. Removal and disposal of the contaminated soils at the ICDF would also provide long-term protection, since the ICDF will be designed to provide isolation for at least 1,000 years.

Closure and D&D plans for the Group 2 buildings and structures will be reviewed by the Agencies, under CERCLA, to ensure that the building or structure end-state satisfies soil and groundwater RAOs and meets ARARs. Decontamination and closure will be completed in a manner that will assure adequate short- and long-term protection of human health and the environment. This will prevent future exposure to contaminated soils and minimize any potential adverse impacts to SRPA groundwater quality above allowable levels for up to 1,000 years, if necessary. Natural radioactive decay will reduce contaminant concentrations to levels that are not a risk to human health or the environment.

Alternative 2 is selected because it best meets the balancing criteria of Implementability and short-term effectiveness, given that Alternative 3 is dependent upon the removal of the buildings and structures to be cost-effective. The Agencies believe that the selected remedy will provide overall protection of human health and the environment and satisfy the RAOs by reducing the potential exposures to less than 1×10^{-4} or a HI less than 1 by eliminating human and environmental exposure pathways.

12.1.5 Other Surface Soils Selected Remedy: Alternative 4A—Excavation and Onsite Disposal in the ICDF

The selected remedy for the Other Surface Soils is excavation and onsite disposal in the ICDF. This remedy will reduce potential exposures to contaminated soils by excavating and disposing the soils in the ICDF. The selected remedy will provide short-term protection of human health and the environment through the implementation of administrative and engineering controls that will limit current worker, non-worker, or community exposures to acceptable levels during soil excavation, transport, and disposal at the ICDF. Short-term protection will be provided during soil excavation using engineering controls to minimize fugitive emissions and radiological engineering controls, health and safety procedures, and safe work practices to prevent exposures or injury. These controls will minimize any short-term risks to workers, non-workers, or the community.

Long-term protection of human health and the environment will be achieved by removing all soils at each release site that exceed the remediation goals to a depth of at least 10 feet below ground and disposing them in the ICDF. The ICDF will be designed for long-term protection and contaminant isolation for at least 1,000 years. Soil excavation and disposal at the ICDF will eliminate the existing surface exposure pathways at the release sites.

The excavated soils will be disposed in the ICDF, an engineered disposal facility, designed for long-term protection and containment. The ICDF will be sited in Site CPP-95 (Figure 11-4). The ICDF

footprint will cover no more than 80 acres. Short-term protection of human health and the environment will be provided through the implementation of institutional and engineering controls, radiological controls, health and safety procedures, and safe work practices during construction, operation, and closure of the ICDF to protect workers, non-workers, and the community from exposure to the disposed contaminated soils. Long-term protection of human health and the environment will be provided by the ICDF which will be designed, constructed, operated, and closed to inhibit intrusion by humans and biota, to provide sufficient shielding to minimize external exposure to radionuclide-contaminated soils, and to limit surface water and precipitation infiltration through the contaminated soils to reduce the potential for leaching and transport of soil contaminants to the perched water or SRPA. The final cover on the ICDF will be designed to provide human and biotic intrusion protection for at least 1,000 years.

Construction of the ICDF will disturb the environment. Environmental disturbances will be minimized by performing the construction activities in compliance with ARARs, the INEEL Storm Water Pollution Prevention Plan, and performing a cultural resource evaluation. All soil disturbance activities will be performed in compliance with the INEEL Storm Water Pollution Prevention Plan, including re-vegetation activities.

A preliminary cultural resource evaluation has been conducted for the areas that might be disturbed by the ICDF. If during soil disturbance activities, unusual materials such as arrowheads, obsidian, or bones are discovered, all work will cease and the INEEL Cultural Resources Office will be contacted for assistance. The land that will be disturbed during ICDF construction has been evaluated for biological resources. There are no known wetlands, unique habitats, or areas occupied by Threatened or Endangered species. As such, consultation with the Fish and Wildlife Service will not be necessary.

Although more costly than Alternative 3, which requires capping each Group 3 site in place, the selected Alternative 4A, reduces the footprint of the WAG 3 restricted area allowing for future development and is expandable to address INEEL-wide CERCLA contaminated media and debris. Further, the consolidation in an engineered landfill with leachate collection will safeguard the underlying SRPA. The Agencies believe that the selected remedy will provide overall protection of human health and the environment because the soils will be permanently excavated to a depth of at least 10 feet and disposed in the ICDF which will be designed to provide protection for at least 1,000 years. This remedy will reduce potential exposures to less than 1×10^{-4} or a HI less than 1.

12.1.6 Perched Water Selected Remedy: Alternative 2—Existing and Additional Institutional Controls with Aquifer Recharge Control

The selected remedy for Perched Water is existing and additional institutional controls with aquifer recharge control. Implementation of the selected remedy will pose no additional risks to workers, non-workers, the community, or the environment. Short-term protection during implementation of the selected remedy will be provided by the implementation of institutional and engineering controls, radiological engineering controls, health and safety procedures, and safe work practices. These actions will limit current worker and non-worker exposures to perched water during drilling, well installation, and monitoring.

Long-term protection of human health and the environment will be achieved by institutional controls, including land and groundwater use restrictions, to eliminate future use of perched water as long as an unacceptable risk remains. The estimated yield of wells completed in the perched water further precludes domestic use and provides a measure of long-term protection. Additional long-term protection is provided by the implementation of aquifer recharge controls, to reduce leaching and transport of soil contaminants to the perched zone, to limit the available water content in the perched zone, and reduce the

potential for future perched water releases to the SRPA. The remedies will be implemented as necessary to provide long-term protection of SRPA groundwater quality. Perched water does not pose either short- or long-term risks to environmental receptors as it is not accessible to biota.

The selected Perched Water alternative requires removing the existing percolation ponds from service, and constructing alternative service wastewater disposal facilities that will not impact SRPA water quality. The replacement percolation ponds will be constructed approximately 3,109 m (10,200 ft) from the existing percolation ponds so as to no longer recharge the contaminated perched zone beneath the INTEC. Replacement percolation pond construction will involve the usual short-term risks involved with similar earth work projects. These short-term risks, if necessary, will be minimized using engineering and radiological controls, health and safety plans, and safe work practices. If removing the existing percolation ponds does not achieve the necessary moisture reduction in the perched zone, lining the Big Lost River to prevent river recharge to the perched zone will also be considered. Neither current workers nor non-workers will be exposed to contaminants during the construction of the replacement percolation ponds or lining the Big Lost River that would result in excess cancer risks or health effects.

Construction of the replacement percolation ponds will disturb the environment. Environmental disturbances will be minimized by performing the construction activities in compliance with ARARs and the INEEL Storm Water Pollution Prevention Plan, and performing a cultural resource evaluation. All soil disturbance activities will be performed in compliance with the INEEL Storm Water Pollution Prevention Plan, including re-vegetation activities.

A preliminary cultural resource evaluation has been conducted for the areas that might be disturbed by the replacement percolation ponds. If during soil disturbance activities, unusual materials such as arrowheads, obsidian, or bones are discovered, all work will cease and the INEEL Cultural Resources Office will be contacted for assistance. The land that will be disturbed as part of the replacement percolation pond construction activities has been evaluated for biological resources. There are no known wetlands, unique habitats, or areas occupied by Threatened or Endangered species. As such, consultation with the Fish and Wildlife Service will not be necessary.

Alternative 2 is selected because it best meets the five balancing criteria while providing overall protection of human health and the environment. The Agencies believe that the selected remedy will provide overall protection of human health and the environment and satisfy RAOs by restricting potential perched water use and reducing water infiltration to minimize future contaminant releases to the SRPA. This remedy will reduce potential risks to human health to less than 1×10^{-4} or a HI less than 1.

12.1.7 Snake River Plain Aquifer Interim Action Selected Remedy: Alternative 2B—Institutional Controls with Monitoring and Contingent Remediation

The selected SRPA remedy is an interim action with existing and additional institutional controls, groundwater monitoring, and contingent remediation. This interim action is a final action for the portion of the SRPA outside the current INTEC security fence. A final action for the portion of the SRPA inside the current INTEC security fence will be developed under OU 3-14. Implementation of the selected remedy poses no additional risks to workers, non-workers, the community, or the environment. Short-term protection will be provided by implementation of institutional and engineering controls, radiological engineering controls, health and safety plans, and safe work practices to limit current worker and non-worker exposures or injuries during SRPA drilling, well installation, and groundwater monitoring. These controls will also protect current workers and non-workers from short-term risks if contingent remediation is implemented. Current workers, non-workers, and the community will also be prevented

from ingesting SRPA groundwater using institutional and engineering controls, such as locked wells or groundwater use restrictions.

Long-term protection of human health and the environment will be achieved by maintaining existing and additional institutional controls, such as land and groundwater use restrictions, over the area of the contaminant plume. These restrictions will prevent exposure to contaminated groundwater during the time that the aquifer is expected to remain above the applicable State of Idaho groundwater quality standards. Long-term protection will also be provided by groundwater monitoring to determine if the SRPA COCs exceed their action levels and if the impacted portion of the aquifer is capable of providing sufficient yield to serve as a water source. If these two conditions are met, contingent pump and treat remediation will be implemented to reduce the contaminant concentrations in the impacted portion of the SRPA so that the unacceptable risk is reduced by meeting the applicable State of Idaho groundwater quality standards and federal MCLs.

SRPA groundwater does not pose either short- or long-term risks to environmental receptors as it is not accessible to biota.

Although Alternative 2A is less costly than the selected alternative 2B, it does not provide any reduction in toxicity, mobility or volume through treatment and may not meet the Remedial Action Objective of restoring the aquifer to drinking water quality by the Year 2095. Therefore, the contingency remedy, Alternative 2B best addresses groundwater modeling concerns regarding aquifer restoration. The Agencies believe that the selected remedy will provide overall protection of human health and the environment and satisfy RAOs by restricting potential SRPA groundwater use outside the current INTEC security fence and implementing contingent pump and treat remediation if contaminant action levels are exceeded and the aquifer is capable of producing a sustainable yield. This remedy will reduce potential risks to human health to less than 1×10^{-4} or an HI less than 1.

12.1.8 Buried Gas Cylinders Selected Remedy: Alternative 2—Removal, Treatment and Disposal

The selected alternative for the Buried Gas Cylinders is removal, treatment, and disposal. Implementation of this remedy does not pose any additional significant risk to the community or the environment. Short-term risks to the workers implementing the remedy will be minimized using institutional and engineering controls, health and safety plans, and safe work practices. These actions will reduce physical hazards and exposures to workers to allowable levels during cylinder removal, transportation, treatment and disposal.

Long-term protection of human health and the environment will be achieved by removing all of the cylinders, treating the cylinder contents as necessary, venting non-hazardous contents directly to the atmosphere, and disposing the empty cylinders.

The Agencies may elect to pursue a contingent remedy of capping in place pursuant to the substantive requirement of IDAPA 16.01.05.008 (40 CFR 264.310) if safety concerns with excavation and removal of the cylinders prevent implementation of the selected remedy.

Alternative 2 is selected because it best meets the five balancing criteria while providing overall protection of human health and the environment. The Agencies believe that the selected remedy will provide overall protection of human health and the environment and satisfy RAOs because the reactive, ignitable, and potentially hazardous gases will be removed, treated (if necessary), and disposed. This remedy will eliminate the safety hazard posed by the cylinders.

12.1.9 SFE-20 Hot Waste Tank System Selected Remedy: Alternative 4—Existing Institutional Controls, Removing and Treating Tank Liquid and Sludge Contents, and Removing the Tank and Associated Structures

The selected alternative for the SFE-20 Hot Waste Tank System includes existing institutional controls, and removal, treatment, and disposal of the tank liquids and sludges, tank, and associated piping and structures. This remedy can be implemented without any additional short-term risks to the community or the environment. Short-term risks to the workers implementing the remedy will be minimized using institutional and engineering controls, health and safety plans, and safe work practices. These actions will reduce physical hazards and exposures to workers to allowable levels during tank liquid and sludge removal and treatment, and removal, decontamination, and disposal of the tank, piping, and associated structures.

Long-term protection of human health and the environment will be achieved by permanently removing, treating, and disposing of the SFE-20 tank liquids and sludges, tank, piping, and associated structure. Any contaminated soils that may exist beneath the structure at concentrations exceeding the RGs will be excavated and disposed in the ICDF to eliminate future leaching and transport of the soil contaminants to the perched water or SRPA.

Alternative 4 is selected because it best meets the five balancing criteria while providing overall protection of human health and the environment and compliance with ARARs. The Agencies believe that the selected remedy will provide overall protection of human health and the environment and satisfy RAOs because the SFE-20 tank system will be permanently removed, treated, and disposed. This remedy will reduce potential risks to human health to less than 1×10^{-4} or a HI less than 1.

12.1.10 Sites Under Other Regulatory Authority

The Agencies have determined that the following six sites are most appropriately dispositioned under other WAGs or INEEL regulatory programs other than CERCLA. These sites, which were investigated and evaluated during the RI/FS include: CPP-38 (asbestos on nine INTEC buildings), CPP-65 (Sewage Treatment Plant lagoons), CPP-66 (Steam Plant fly ash pits), CPP-61 (area within CPP-718 transformer yard), CPP-81 (abandoned pipeline from Calciner Pilot Plant), and CPP-82 (wastewater spills from ruptured pipelines). Sites CPP-61, -81, and –82 will be transferred to OU 3-14 for further evaluation. These sites will be included under the CERCLA 5-year review process to ensure that the necessary actions by the other OUs, WAGs or regulatory programs are performed.

Site CPP-38 consists of transite asbestos on nine buildings at INTEC. A Track 1 decision document was written and demonstrated that the asbestos is a nonfriable form and represents a low risk. Therefore, the Agencies decided that this site would be more appropriately administered and remediated (if necessary) under the INEEL Asbestos Abatement Program. INEEL asbestos management is implemented in accordance with NESHAPs.

Site CPP-65 is the INTEC Sewage Treatment Plant lagoons which treat sanitary waste from 31 INTEC facilities. The Sewage Treatment Plant began operation in 1984 and is currently used. The lagoons include four infiltration/percolation trenches that are used to dispose of treated sanitary wastewater. The lagoons were investigated in the RI/BRA (DOE-ID 1997a, Section 9.3) where it was determined that site CPP-65 is not a significant source of contamination to the groundwater. However; the lagoons appear to contribute water to the perched zone and eventually the SRPA. The water discharged to the lagoons was included as a water-source term in the vadose zone modeling conducted for the RI/BRA. The Agencies have decided that final closure of the Sewage Treatment Plant lagoons would

be most appropriately handled under the Idaho Wastewater Land Application Permit Rules (IDAPA 16.01.07). This decision was based on the low concentration of contaminants in the plant effluent and the continued use of the lagoons. However, if additional perched water actions are deemed necessary by the Agencies to further reduce recharge to the perched zone, then the closure and relocation of the Sewage Treatment Plant lagoons will be managed under CERCLA.

Site CPP-66 is the coal-fired steam generation facility fly ash pit located southeast of the INTEC. The pit has been used for the disposal of fly ash produced by the INTEC steam generation facility since 1984. The ash in the pit contains natural radionuclides and metals derived from coal and limestone. Site CPP-66 was evaluated using the Track 1 process in 1993 and recommended for "No Further Action" based on a human health risk evaluation. Subsequently, an ecological risk screening was performed during the OU 3-13 RI/BRA, which suggested that a risk to environmental receptors may exist from the metals present in the ash. The Agencies have determined that the site will be transferred to OU 10-04 for further evaluation and remediation, if necessary.

Site CPP-61 is an area within the CPP-718 transformer yard where a PCB oil spill occurred in the early 1980's. Approximately 1,510 L (400 gal) of PCB oil was spilled. The PCB concentration in the oil was 179 ppm. Most of the spill was contained, however, some spilled oil contaminated the surrounding soil. In 1985, the spill area was cleaned up; approximately 40 drums of soil and debris were removed. A new transformer and concrete pad have been installed over the site. Three soil borings were drilled and soil samples analyzed for radionuclides. The radionuclides found were below risk-based soil concentrations. The Agencies have determined that Site CPP-61 will be transferred to OU 3-14 for further evaluation. This decision is based upon the uncertain amount of PCB contamination that may remain under the concrete pad (WINCO 1992a).

Site CPP-81 is an abandoned line from the 30-cm (12-in.) Calciner Pilot Plant. The line, located approximately 0.6- to 0.9-m (2- to 3-ft) bls, contained simulated calcine that became plugged in the line following a test run. During the fall of 1993, the line was cleaned as part of a time-critical removal action. The line was flushed with hot acid to remove the simulated calcine. No leaks were observed during the removal action indicating that no previous release to the environment had occurred. The final water rinse was analyzed and found to not contain contaminants above toxicity characteristic leaching procedure (TCLP) limits. The Agencies have determined that Site CPP-81 will be transferred to OU 3-14 for further evaluation.

Site CPP-82 is the location of three waste water spills (designated Sites A, B, and C) caused by rupturing of previously abandoned underground lines. The lines were ruptured during excavation activities. In the spill associated with Site A, an estimated 9.4 L (2.5 gal) of low-level radioactive waste escaped; the abandoned line and contaminated soil associated with the leak were removed and disposed. Sites B and C are associated with spills of nonradioactive, nonhazardous waste water; these spills occurred during the repair activities associated with Site A. The Agencies have determined that Site CPP-82 will be transferred to OU 3-14 for further evaluation.

12.1.11 Five-Year Reviews

The remedial actions taken under this ROD will be reviewed under the CERCLA 5-year review process to ensure their protectiveness. Five-year reviews will also ensure that any changes in the physical configuration of any INTEC facility or site (such as D&D) where there is suspicion of a release of hazardous or radioactive substances will be managed to achieve remediation goals established in the ROD. The 5-year reviews will continue as long as contaminants exist at levels which result in restricted or limited site usage.

12.2 Compliance with ARARs

Compliance with action-, chemical-, and location-specific ARARs is described in Sections 12.2.1 through 12.2.7 for the selected remedy for each group. Chemical-specific ARARs are generally health- or risk-based requirements that establish numerical limits on the amounts or concentrations of a particular radionuclide, compound or material that may be discharged to or present in the environment. Location-specific ARARs restrict specific activities occurring in particular locations. Action-specific ARARs restrict specific types of remedy activities or technologies.

The most significant uncertainty at OU 3-13 sites is whether or not RCRA-hazardous materials are present at Soils Under Buildings sites, Other Surface Soils sites, the Buried Gas cylinders, and in the SFE-20 Hot Waste Tank contents and system; as well as in residuals produced while treating SRPA water and the SFE-20 tank contents. Media and materials from these sites will be characterized to facilitate material handling and disposal options. RCRA and IDAPA ARARs that will apply if these materials are determined to be hazardous are cited in the ARARs tables for the selected remedy for each group, with qualifying statements, and are discussed in the following sections.

Investigation derived waste (IDW) from OU 3-13 RD/RA activities and OU 3-14 investigations, including soil cuttings, well purge water, personnel protective equipment, decontamination water, and similar wastes generated during sampling and inspection/maintenance activities will be temporarily managed (not to exceed 1 year) in a staging area under the substantive portions of IDAPA 16.01.05.008 40 CFR 264.544 Remediation Waste Staging Piles). By managing the wastes in this area, placement will not be triggered. If these wastes are treated in temporary units under IDAPA 16.01.05.008 (40 CFR 264.553), they may be subject to LDRs. The final disposition of these wastes will be in the ICDF.

This ROD recognizes that INTEC is an operating facility, it is possible that changes in physical configuration of INTEC may uncover new sites or change the residual risk posed by those sites addressed under this ROD. Any planned disturbance at a site for which action is required under this ROD (including the "No Further Action" sites with institutional controls) will be preceded by appropriate planning documents to be submitted to and concurred on by the Agencies prior to implementation. Newly discovered sites will be subject to remedial action pursuant to the terms and conditions of the FFA/CO.

12.2.1 Tank Farm Soils Interim Action: Alternative 3—Institutional Controls with Surface Water Control.

Compliance with action-, chemical-, and location-specific ARARs for the selected remedy for the Tank Farm Soils Interim Action, Alternative 3, is summarized in Table 12-1. A discussion of the ARARs and TBCs is provided below.

12.2.1.1 Action-Specific ARARs. Site security, inspections, and personnel training will be required during the interim action period. These requirements will be met by institutional and engineering controls, radiological safety measures, and health and safety plans implemented or planned for the site.

State of Idaho Fugitive Dust Emission Rules will apply to any activities that generate fugitive dust. These rules require that reasonable precautions be taken to prevent the generation of fugitive dust from unprotected surfaces, as well as during active operations. Engineering controls will be implemented to meet these rules.

Table 12-1. Compliance with ARARs for Group 1—Tank Farm Soils Interim Action Selected Remedy.

Alternative/ARARs citation	Description	Applicable, or Relevant and Appropriate (R&A), or TBC	Comments
Group 1—Tank Farm Soils Interim Action: Alternative 3—Institutional Controls with Surface Water Control			
Action-specific			
IDAPA 16.01.05.008 (40 CFR 264.14)	Site security	Applicable	Applies only if RCRA units are created as part of interim action.
IDAPA 16.01.05.008 (40 CFR 264.15)	General inspection requirements	Applicable	Applies only if RCRA units are created as part of interim action.
IDAPA 16.01.05.008 (40 CFR 264.16)	Personnel security	Applicable	Applies only if RCRA units are created as part of interim action.
IDAPA 16.01.01.650, 16.01.01.651	Idaho fugitive dust emissions	Applicable	Applies during construction of remedies and observation wells; will be met through engineering controls
40 CFR 122.26	Storm water discharges during construction	Applicable	Applies during construction of remedies; will be met though engineering controls.
40 CFR 61.92 40 CFR 61.93	NESHAPS for Radionuclides from DOE Facilities, Emission Monitoring and Emission Compliance	Applicable	Applies during construction of remedies; will be met though engineering controls.
IDAPA 16.01.01.585, 16.01.01.586	Rules for Control of Air Pollution in Idaho	Applicable	Applies during construction of remedies; will be met though engineering controls.
IDAPA 16.01.05.008 [40 CFR 264.310(b)(5)]	Run-on and run-off controls	Applicable	Run-on to and run-off from RCRA hazardous soils, if present, will be controlled during the interim action period.
IDAPA 16.01.05.008 (40 CFR 264.553)	Temporary units	Applicable	Applies to the soil stockpiles derived from grading and sealing the Tank Farm or from construction of the diversion channels
IDAPA 16.01.05.008 (40 CFR 264.554)	Remediation waste staging piles	Applicable	Applies to the soil stockpiles derived from grading and sealing the Tank Farm or from construction of the diversion channels
Chemical-specific			
None identified			
Location-specific			
None identified			

Table 12-1. (continued).

Alternative/ARARs citation	Description	Applicable, or Relevant and Appropriate (R&A), or TBC	Comments
TBCs			
DOE Order 435.1	Radioactive waste management performance objectives to protect workers.	TBC	Substantive design and construction requirements will be met to protect workers.
DOE Order 5400.5	Exposures to public will be ALARA	TBC	Substantive design and construction requirements will be met to keep public exposures ALARA

Storm Water Discharges during Construction Rules require control of contamination that discharges into waters of the United States. These rules will be met by administrative and engineering controls on construction activities.

NESHAPs for radionuclide emissions from DOE facilities applies to construction or other activities that may suspend radionuclides in fugitive dust. The radiation dose to the public produced by these activities will be estimated and included in the annual INEEL calculations and reports. If radionuclides associated with fugitive dust releases exceed acceptable standards, then the need for additional measures will be evaluated and implemented as appropriate.

IDAPA Rules for Control of Air Pollution in Idaho apply because they also address releases or emissions of toxic and/or carcinogenic constituents to the atmosphere, which may occur during construction activities. Engineering and administrative controls would be used to maintain fugitive emissions below allowable levels.

IDAPA/RCRA rules for controlling run-on and run-off will be met through engineering and administrative controls, if Tank Farm soils are determined to be RCRA hazardous. Ground surfaces will be graded to reduce the potential for flooding during precipitation or snowmelt events. Building roof drains will be improved to divert potential run-on away from areas of suspected contamination.

If any hazardous waste contaminated soils or water are generated as part of the interim action, they will be temporarily managed according to the substantive requirements of IDAPA16.01.05.008 (40 CFR 264.553 [Temporary Units] and 40 CFR 264.554 [Remediation Waste Staging Piles]). Wastes treated in the Temporary Units my be subject to LDRs.

Tank Farm soils that may be contaminated while grading and sealing the Tank Farm soils and constructing the surface water diversion system will be managed in temporary storage units or remediation waste staging piles and disposed in the ICDF as necessary. These soils will be required to meet the substantive requirements of IDAPA HWMA rules.

12.2.1.2 Chemical-Specific. No chemical-specific ARARs were identified for this alternative.

12.2.1.3 Location-Specific. No location-specific ARARs were identified for this alternative.

12.2.1.4 TBCs. DOE Orders 435.1 and 5400.5 provide guidance on radiological human health and environmental protection, on cleanup and management of residual radioactive material, and the release of property. Radiation exposures to the public, workers, and the environment will be kept as low as reasonably achievable (ALARA) as required by these orders.

12.2.2 Soils Under Buildings and Structures Selected Remedy: Alternative 2—Institutional Controls with Containment

Compliance with action-, chemical-, and location-specific ARARs for the selected remedy for the Soils under Buildings or Structures, Alternative 2, is summarized in Table 12-2. A discussion of the ARARs and TBCs is provided below.

Action-Specific. Site security, inspections, and personnel training will be required during the institutional control period if the soils are capped in place. These requirements will be met by the institutional and engineering controls, radiological safety measures, and health and safety plans implemented or planned for the site. Idaho Fugitive Dust Rules and Rules for Control of Air Pollution,

Table 12-2. Compliance with ARARs for Group 2—Soils under Buildings and Structures Selected Remedy.

Alternative/ARARs citation	Description	Applicable, or Relevant and Appropriate (R&A), or TBC	Comments
Group 2—Soils Under Buildings and Structures: Alternative 2—Institutional Controls with Containment			
Action-specific			
IDAPA 16.01.05.008 [40 CFR 264.14(a), (b), (c)]	Site security	Applicable	Applies if the soils are capped in place with an engineered barrier
IDAPA 16.01.05.008 [40 CFR 264.15(a),(c)]	General inspection requirements	Applicable	Applies if the soils are capped in place with an engineered barrier
IDAPA 16.01.05.008 [40 CFR 264.16(a)(1),(c)	Personnel training	Applicable	Applies if the soils are capped in place with an engineered barrier
IDAPA 16.01.01.650, 16.01.01.651	Idaho fugitive dust emissions	Applicable	Applies during construction; will be met during barrier's 1000-year estimated design life.
IDAPA 16.01.01.585, 16.01.01.586	Rules for Control of Air Pollution in Idaho	Applicable	Will be met during construction by administrative and engineering controls.
40 CFR 61.92 40 CFR 61.93	NESHAPS for Radionuclides from DOE Facilities, Emission Monitoring and Emission Compliance	Applicable	Airborne releases will be minimized by overlying building and/or structure, by administrative and engineering controls during construction, and subsequently by the barrier.
40 CFR 122.6	Storm water discharges during construction	Applicable	Will be met during construction through administrative and engineering controls
IDAPA 16.01.05.008 (40 CFR 264.553)	Temporary units	Applicable	Applies for soils or liquids (i.e., purge water) that are excavated and managed on-site
IDAPA 16.01.05.008 (40 CFR 264.554)	Remediation waste staging piles	Applicable	Applies for soils that are excavated and managed on-site
IDAPA 16.01.05.008 (40 CFR 264.97)	General groundwater monitoring requirements	Applicable	Substantive requirements will be met to detect future releases from the Group 2 sites which are left in place.
IDAPA 16.01.05.008 [40 CFR 264.309 (a) and (b)]	Surveying and recordkeeping	R&A	Applies if the soils are capped with an engineered barrier; substantive requirements will be met.

Table 12-2. (continued).

Alternative/ARARs citation	Description	Applicable, or Relevant and Appropriate (R&A), or TBC	Comments
IDAPA 16.01.05.008 [40 CFR 264.310(a)1-5]	Landfill closure requirements	Applicable	Applies if the soils are capped with an engineered barrier; substantive requirements will be met.
IDAPA 16.01.05.008 [40 CFR 264.310(b)(1)(4)(5)(6)]	Landfill post-closure requirements	Applicable	Applies if the soils are capped with an engineered barrier; substantive requirements will be met. 40 CFR 264.97 will be used to meet the requirements of 40 CFR 264.310(b)(4)
Chemical-specific			
IDAPA 16.01.05.006 (40 CFR 262.11)	Hazardous waste determination	Applicable	Applies to soils that are excavated and that may require pretreatment to meet ICDF waste acceptance criteria; applies to soils where a hazardous waste determination has not been made.
IDAPA 16.01.05.005 (40 CFR 261.20 through 24)	Hazardous waste characteristics identification	Applicable	Applies for hazardous waste contaminated soils that are excavated and disposed off-site
Location-specific			
None identified			
TBCs			
DOE Order 435.1	Radioactive waste management performance objectives to protect workers	TBC	Substantive design and construction requirements will be met to keep radiation exposures ALARA
DOE Order 5400.5	Exposures to the public will be kept ALARA	TBC	Substantive design and construction requirements will be met to keep public exposure ALARA.

NESHAPs, storm water discharges during construction, and DOE Orders 435.1 and 5400.5 apply as previously described for Group 1.

If the building or structure is removed so that contaminated soils are exposed, they will either be capped with an engineered barrier or will be excavated as Group 3 soils and disposed in the ICDF. If the soils are capped with an engineered barrier, the substantive requirements of the hazardous waste landfill closure and post-closure regulations, including surveying and recordkeeping and DOE Orders 435.1 and 5400.5 will apply. These requirements will be met by designing, constructing, and maintaining the cap so that the hazardous waste landfill closure and post-closure performance standards are met. Groundwater monitoring will be required for soils that remain in place to determine if soil contaminants are leached and transported to the perched water or the SRPA.

If the exposed soils are excavated and disposed in the ICDF, the action-specific ARARs for the Other Surface Soils will apply. These ARARs will be met as described for the Other Surface Soils in Section 12.2.3.

Excavated soils may be temporarily (not to exceed 1 year) managed within the AOC under the substantive requirements of IDAPA 16.01.05.008 (40 CFR 264.553 and 40 CFR 264.554). Soils or liquids treated in the Temporary Units may be subject to LDRs.

12.2.2.1 Chemical-Specific. RCRA hazardous waste characteristics identification is required to facilitate handling and management of newly generated hazardous waste contaminated soils that will be shipped and disposed off-site. Soils that are only being consolidated within the WAG 3 AOC are not subject to RCRA hazardous waste characterization, but will be subject to Waste Acceptance Criteria evaluation if disposed in the ICDF.

12.2.2.2 Location-Specific. No location-specific ARARs were identified for this alternative.

12.2.2.3 TBCs. Exposures to the public will be kept ALARA as required by DOE Orders 435.1 and 5400.5. Engineering and administrative controls used under DOE's ALARA program will reduce public exposures to allowable levels during barrier construction or soil excavation. The final site configuration will be designed, constructed, maintained, and monitored in the post-closure period to meet DOE Orders 435.1 and 5400.5 performance objectives.

12.2.3 Other Surface Soils Selected Remedy: Alternative 4A—Removal and On-Site Disposal

Compliance with action-, chemical-, and location-specific ARARs for the selected remedy for Other Surface Soils, Alternative 4A, is summarized in Table 12-3. A discussion of the ARARs and TBCs is provided below. ARARs discussed for this alternative relate both to excavation and disposal of the Other Surface Soils, and to the design, construction, operation, closure and post-closure of the ICDF, which is implemented under this alternative. The Group 3 soils consist of release sites with low-level radioactive and mixed waste soils. Sites CPP-92, -98, and –99 are boxed mixed waste soils. Site CPP-97 is a stockpile of mixed waste soils.

12.2.3.1 Action-Specific. Action-specific ARARs for this alternative relate both to excavation and transportation of Other Surface Soils to the ICDF; and to the design, construction, operation, closure and post-closure of the ICDF. Site security, inspections, and personnel training will be required at the ICDF or for soils that are capped in place. These requirements will be met by institutional and engineering controls, radiological safety measures, and health and safety plans implemented or planned for the site.

Table 12-3. Compliance with ARARs for Group 3—Other Surface Soils Selected Remedy.

Alternative/ARARs citation	Description	Applicable, or Relevant and Appropriate (R&A), or TBC	Comments
Group 3—Other Surface Soils: Alternative 4A—Removal and Onsite Disposal			
Action-specific			
IDAPA 16.01.01.650, 16.01.01.651	Idaho fugitive dust emissions	Applicable	Will be met during construction through administrative and engineering controls.
IDAPA 16.01.01.585 IDAPA 16.01.01.586	Rules for the control of air pollution in Idaho	Applicable	Will be met using administrative and engineering controls
40 CFR 61.92 40 CFR 61.93	NESHAPs for Radionuclides from DOE Facilities, Emission Monitoring and Emission Compliance	Applicable	Will be met using administrative and engineering controls
40 CFR 122.26	Storm water discharges during construction	Applicable	Will be met during excavation and disposal through engineering controls.
IDAPA 16.01.05.006 (40 CFR 262.11)	Hazardous waste determination	applicable	Applies if the soils disposed outside of the WAG 3 AOC; applies to soils where a hazardous waste determination has not been made
IDAPA 16.01.05.008 (40 CFR 264.553)	Temporary units	Applicable	Applies to temporary (< 1 year) storage or treatment units
IDAPA 16.01.05.008 (40 CFR 264.554)	Remediation waste staging piles	Applicable	Excavated soils can be temporarily staged prior to disposal in the ICDF without triggering LDRs or MTRs
IDAPA 16.01.05.011 (40 CFR 268)	Land disposal restrictions	Applicable	Applies only to soils from sites CPP-92, CPP-97, CPP-98, and CPP-99 or soils that have triggered placement
IDAPA 16.01.05.011 (40 CFR 268.49)	Alternative LDR treatment standards for contaminated soils	Applicable	Applies only to soils from sites CPP-92, CPP-97, CPP-98, and CPP-99 or soils that have triggered placement.
Chemical-specific			
IDAPA 16.01.05.005 (40 CFR 261.20 through 24)	Hazardous waste characteristics identification	Applicable	Applies if the soils are excavated and consolidated to facilitate their management and for soils that are treated or placed in a long-term storage unit
40 CFR 761.50(a)(5)	PCB disposal requirements	Applicable	Applies to PCB-contaminated soils and debris.
40 CFR 761.50(b)(3)	PCB remediation waste	Applicable	Applies to PCB-contaminated soils and debris.

Table 12-3. (continued).

Alternative/ARARs citation	Description	Applicable, or Relevant and Appropriate (R&A), or TBC	Comments
40 CFR 761.50(b)(7)	PCB radioactive waste	Applicable	Applies to PCB-contaminated soils and debris.
40 CFR 761.50(b)(8)	Porous surfaces	Applicable	Applies to PCB-contaminated soils and debris.
40 CFR 761.50(d)(4)	Disposal requirements for PCBs	Applicable	Applies to PCB-contaminated soils and debris.
Location-specific			
None			
TBCs			
DOE Order 435.1	Radioactive waste management performance objectives to protect workers	TBC	Substantive requirements will be met for excavation, handling, and transport of radionuclide contaminated soils to the ICDF to project workers.
DOE Order 5400.5	Exposures to the public will be kept ALARA	TBC	Will be met by administrative and engineering controls during excavation of contaminated soils, and construction, operation, and closure of the ICDF.
Group 3—Other Surface Soils: Alternative 4A—ICDF Design, Construction and Operation for Group 3 Soils			
Action-specific			
IDAPA 16.01.01.650, 16.01.01.651	Idaho fugitive dust emissions	Applicable	Will be met during construction through administrative and engineering controls.
IDAPA 16.01.01.585 IDAPA 16.01.01.586	Rules for the control of air pollution in Idaho	Applicable	Will be met using administrative and engineering controls
40 CFR 61.92 40 CFR 61.93	NESHAPS for Radionuclides from DOE Facilities, Emission Monitoring and Emission Compliance	Applicable	Will be met using administrative and engineering controls
40 CFR 122.26	Storm water discharges during construction	Applicable	Will be met during excavation and disposal through engineering controls.
IDAPA 16.01.05.008 [40 CFR 264.14(a), (b), (c)]	Site security	Applicable	Applies to either soils capped in place or consolidated in the ICDF.
IDAPA 16.01.05.008 [40 CFR 264.15(a),(c)]	General inspection requirements	Applicable	Applies to either soils capped in place or consolidated in the ICDF.
IDAPA 16.01.05.008 [40 CFR 264.16(a)(1),(c)]	Personnel training	Applicable	Applies to either soils capped in place or consolidated in the ICDF.

Table 12-3. (continued).

Alternative/ARARs citation	Description	Applicable, or Relevant and Appropriate (R&A), or TBC	Comments
IDAPA 16.01.05.008 (40 CFR 264.92)	Groundwater protection standard	Applicable	Substantive parts of regulations will be met
IDAPA 16.01.05.008 (40 CFR 264.93)	Hazardous constituents	Applicable	Substantive parts of regulations will be met
IDAPA 16.01.05.008 (40 CFR 264.95)	Point of compliance	Applicable	Substantive parts of regulations will be met
IDAPA 16.01.05.008 (40 CFR 264.97)	General groundwater monitoring requirements	Applicable	Substantive parts of regulations will be met
IDAPA 16.01.05.008 (40 CFR 264.98)	Detection monitoring program	Applicable	Substantive parts of regulations will be met
IDAPA 16.01.05.008 (40 CFR 264.114)	Disposal and decontamination of equipment, structures, and soils	Applicable	All equipment will be decontaminated before leaving the ICDF.
IDAPA 16.01.05.008 (40 CFR 264.301)	Landfill design and operating requirements	Applicable	ICDF will be designed to meet minimum technology requirements or equivalent.
IDAPA 16.01.05.008 [40 CFR 264.309(a) and (b)	Surveying and recordkeeping	Applicable	Substantive requirements will be met
IDAPA 16.01.05.008 [40 CFR 264.310(a)(1)(2)(3)(4)(5)]	Landfill closure requirements	Applicable	Substantive requirements will be met
IDAPA 16.01.05.008 [40 CFR 264.310(b)(1)(4)(5)(6)]	Landfill post-closure requirements	Applicable	Substantive requirements will be met
IDAPA 16.01.05.008 [40 CFR 264.18(a) and (b)]	Landfill location standards	Applicable	Substantive requirements will be met
IDAPA 16.01.05.008 (40 CFR 264.302)	Landfill action leakage rate	Applicable	Substantive requirements will be met
IDAPA 16.01.05.008 (40 CFR 264.553)	Temporary units	Applicable	Applies for soils or liquids that are managed on-site
IDAPA 16.01.05.008 (40 CFR 264.554)	Remediation waste staging piles	Applicable	Applies for soils that are excavated and managed on-site
40 CFR 761.75(b)(1)(2)	PCB landfill design requirements	Applicable	Applicable for PCB-contaminated soils; Substantive requirements will be met
40 CFR 761.79(a) and (b)	PCB container and moveable equipment decontamination requirements	Applicable	Applicable for PCB-contaminated soils; Substantive requirements will be met
IDAPA 16.01.05.008 (40 CFR 264.192)	Design and installation of new tank systems or components	Applicable	Applies to the SSST.
IDAPA 16.01.05.008 (40 CFR 264.601)	Miscellaneous units environmental performance standards	Applicable	Applies to the SSST.
IDAPA 16.01.05.008 (40 CFR 264, Subpart I)	Use and management of containers	Applicable	Applies to the SSST.
IDAPA 16.01.05.008 (40 CFR 264, Subpart DD)	Containment buildings	Applicable	Applies to the SSST.

Table 12-3. (continued).

Alternative/ARARs citation	Description	Applicable, or Relevant and Appropriate (R&A), or TBC	Comments
IDAPA 16.01.05.008 (40 CFR 264.1052 through 1062)	Air emissions standards for equipment leaks	Applicable	Applies to the SSST.
IDAPA 16.01.05.008 (40 CFR 264.1082 through 1088)	Air emission standards for tanks, surface impoundments, and containers	Applicable	Applies to the SSST and evaporation pond.
IDAPA 16.01.05.008 (40 CFR 264.221)	Surface impoundment design and operating requirements	Applicable	Applies to the SSST and evaporation pond.
IDAPA 16.01.05.008 (40 CFR 264.552)	Corrective action management units (CAMUs)	Applicable	Applies to the evaporation pond.
IDAPA 16.01.05.006 (40 CFR 262.34[a][1])	Hazardous waste accumulation time	Applicable	Applies to the SSST.
IDAPA 16.01.05.008 (40 CFR 264, Subpart F)	Releases from solid waste management units	Applicable	Applies to closure and post-closure of ICDF Complex.
IDAPA 16.01.05.008 (40 CFR 264, Subpart G)	Closure and post-closure	Applicable	Applies to closure and post-closure of ICDF Complex.
Chemical-specific			
IDAPA 16.01.05.005 (40 CFR 261.20 through 24)	Hazardous waste characteristics identification	Applicable	Applies to soils received from outside the WAG 3 AOC
Location-specific			
16 USC 469 et seq. 36 CFR 65	National Archeological and Historical Preservation Act	Applicable	Will be met during siting new excavations/construction in previously undisturbed areas
25 USC 3001	Native American Graves Protection and Repatriation Act	Applicable	Will be met during siting new excavations/construction in previously undisturbed areas
TBCs			
DOE Order 435.1	Radioactive waste management performance objectives to protect workers	TBC	Substantive requirements will be met in designing, constructing, and operating the ICDF to protect workers
DOE Order 5400.5	Exposures to the public will be kept ALARA	TBC	Will be met by administrative and engineering controls during excavation of contaminated soils, and construction and operation of the ICDF; and by the capping system after closure.

Table 12-3. (continued).

Alternative/ARARs citation	Description	Applicable, or Relevant and Appropriate (R&A), or TBC	Comments
Group 3—Other Surface Soils: Alternative 4A—ICDF Operations for Non-INTEC Soils and Debris			
Action-specific			
IDAPA 16.01.05.011 (40 CFR 268)	Land disposal restrictions	Applicable	Will be met for off WAG 3 wastes by treating remediation wastes from outside the WAG 3 AOC to be disposed of in the ICDF as required.
IDAPA 16.01.05.011 (40 CFR 268.49)	Alternative land disposal restrictions treatment standards for contaminated soil	Applicable	Will be met by treating remediation wastes from outside the WAG 3 AOC disposed of in the ICDF as required.
Chemical-specific			
IDAPA 16.01.05.005 (40 CFR 261)	Identification and listing of hazardous waste	Applicable	Substantive requirements will be met for soils received from outside the OU 3-13 AOC.
IDAPA 16.01.05.006 (40 CFR 262.11)	Hazardous waste determination	Applicable	Will be met for off WAG 3 materials prior to excavation by characterizing wastes from outside the WAG 3 AOC.
40 CFR 761.50(a)(5)	PCB disposal requirements	Applicable	Applies to PCB-contaminated soils and debris.
40 CFR 761.50(b)(3)	PCB remediation waste	Applicable	Applies to PCB-contaminated soils and debris.
40 CFR 761.50(b)(7)	PCB radioactive waste	Applicable	Applies to PCB-contaminated soils and debris.
40 CFR 761.50(b)(8)	Porous surfaces	Applicable	Applies to PCB-contaminated soils and debris.
40 CFR 761.50(d)(4)	Disposal requirements for PCBs	Applicable	Applies to PCB-contaminated soils and debris.
Location-specific			
None			
TBCs			
DOE Order 435.1	Radioactive waste management performance objectives to protect workers	TBC	Substantive requirements will be met for excavation, handling, and transport of off-AOC radionuclide contaminated soils to the ICDF to protect workers
DOE Order 5400.5	Exposures to the public will be kept ALARA	TBC	Will be met by administrative and engineering controls during excavation of contaminated soils, and construction and operation of the ICDF; and by the capping system after closure.